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FOLLOWING PAGE

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 CHILDREN'S HEALTH DEFENSE,

20 Plaintiff,

21 v.

22 FACEBOOK, INC., ET AL.,

23 Defendants.

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CHILDREN'S HEALTH DEFENSE

Case No. 3:20-cv-05787-SI

CIVIL LOCAL RULE 7-12
STIPULATION REGARDING PAGE
LIMITATIONS

Hon. Susan Illston

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16 THE POYNTER INSTITUTE FOR MEDIA
STUDIES, INC.

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1 Pursuant to Civil Local Rule 7-12, Defendants Facebook, Inc., Mark Zuckerberg, and the
2 Poynter Institute for Media Studies, Inc. (collectively “Defendants”) and Plaintiff Children’s Health
3 Defense hereby stipulate and agree as follows:

4 WHEREAS, Plaintiff filed its First Amended Complaint on November 13, 2020 (Dkt. 64);

5 WHEREAS, Plaintiff filed a motion for leave to file a Second Amended Complaint on
6 December 4, 2020 (Dkt. 65);

7 WHEREAS, under the current briefing schedule, Defendants’ motions to dismiss the First
8 Amended Complaint are due December 21, 2020, Plaintiff’s oppositions are due February 5, 2021,
9 Defendants’ replies are due March 5, 2021, and a motion hearing is set for March 19, 2021;

10 WHEREAS, absent Defendants’ consent to Plaintiff’s motion for leave to file, Defendants’
11 oppositions to that motion would be due December 18, 2020 and Plaintiff’s reply would be due
12 December 28, 2020;

13 WHEREAS, all parties agree it would be more efficient to conduct a single round of briefing
14 on the Second Amended Complaint, rather than simultaneous briefing on the First Amended
15 Complaint and Plaintiff’s motion for leave to file, with potential briefing on the Second Amended
16 Complaint to follow;

17 WHEREAS, the parties have therefore agreed, subject to the Court’s approval, that (1) Facebook,
18 Mr. Zuckerberg, and Poynter will consent to Plaintiff’s motion for leave to file the
19 Second Amended Complaint (Dkt. #65-1), which shall be deemed the operative Complaint in this
20 action; (2) Facebook and Mark Zuckerberg may have three additional pages for their combined
21 motion to dismiss (for a total of 28 pages); (3) Poynter may have three additional pages for its own
22 motion to dismiss (for a total of 28 pages); (4) Plaintiff may have three additional pages for its
23 opposition to Facebook and Mr. Zuckerberg’s combined motion to dismiss (for a total of 28 pages);
24 and (5) Plaintiff may have three additional pages for its opposition to Poynter’s motion to dismiss
25 (for a total of 28 pages).

1 Dated: December 14, 2020

WILMER CUTLER PICKERING, HALE AND
DORR LLP

2 By: /s/ Sonal N. Mehta
3 SONAL N. MEHTA

4 *Attorney for Defendants*
5 Facebook, Inc. and Mark Zuckerberg

6 Dated: December 14, 2020

THOMAS LOCICERO PL

7 By: /s/ Carol Jean LoCicero
8 CAROL JEAN LOCICERO

9 *Attorney for Defendants*
10 The Poynter Institute for Media Studies, Inc.

11 Dated: December 14, 2020

By: /s/ Roger I. Teich
12 ROGER I. TEICH

13 *Attorney for Plaintiff*
14 Children's Health Defense

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2020, I electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

Dated: December 14, 2020

By: /s/ Sonal N. Mehta
Sonal N. Mehta

ATTORNEY ATTESTATION

I, Sonal N. Mehta, am the ECF User whose ID and password are being used to file this Stipulation and accompanying proposed order. In compliance with Civil Local Rule 5-l(i)(3), I hereby attest that concurrence in the filing of this document and all attachments has been obtained from each signatory.

Dated: December 14, 2020

By: /s/ Sonal N. Mehta
Sonal N. Mehta